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FILED  
U.S. DISTRICT COURT  
DISTRICT OF WYOMING  
2013 JAN 16 PM 1 10  
STEPHAN HARRIS, CLERK  
CHEYENNE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

**UNITED STATES OF AMERICA**

Plaintiff,

v.

**THEODORE WILSON CHAPUT,**

Defendant.

No. 13-cr-18-S

MOTION FOR DETENTION HEARING

The United States moves for pretrial detention of defendant, pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility of Case. This case is eligible for a detention order because the case involves the following:

- ☒ Crime of violence (18 U.S.C. § 3156)
- ☐ Maximum sentence life imprisonment or death
- ☐ 10+ year drug offense
- ☒ Serious risk defendant will flee
- ☐ Felony, with two prior convictions in above categories
- ☒ Serious risk obstruction of justice

2. Reason for Detention. The court should detain defendants because there are no conditions of release which will reasonably assure:

- ☒ Defendant's appearance as required
- ☒ Safety of any other person and the community

3. Rebuttable Presumption. The United States will invoke the rebuttable presumption against defendant under § 3142(e). The presumption applies because:

- ☒ Probable cause to believe defendant committed 10+ year drug offense, firearms offense, 18 U.S.C. § 924(c), or child exploitation offense.

☐ Previous conviction for "eligible" offense committed while on pretrial bond

4. Time for Detention Hearing. The United states requests the court conduct the detention hearing:

- ☐ At first appearance
- ☒ After a continuance of 3 days

DATED this 16 day of January, 2013.

Respectfully submitted,

CHRISTOPHER A. CROFTS  
United States Attorney

  
JAMES C. ANDERSON  
Assistant United States Attorney